BY ORDER OF THE COMMANDER AERONAUTICAL SYSTEMS CENTER (AFMC) ASC INSTRUCTION 63-401 5 JANUARY 1999

Acquisition





NOTICE: This publication is available digitally on the HQ AFMC WWW site at: http://afmc.wpafb.af.mil. If you lack access, contact your Publishing Distribution Office (PDO).

OPR: ASC/CDS (Robert L. Stout) Certified by: ASC/CD (Dr. Vincent J. Russo)

Supersedes ASCI 63-401, 5 April 1996 Pages: 31

Distribution: F

ASC Instruction 63-401 implements *Advisory and Assistance Services* (A&AS) policy provided in Department of Defense Directive (DoDD) 4205.2, Air Force Policy Directive (AFPD) 63-4, and Air Force Instruction (AFI) 63-401. This instruction identifies the process for acquiring A&AS and the responsibilities for the proper identification, management, and reporting of A&AS. It applies to all Aeronautical Systems Center (ASC) organizations, which include ASC Acquisition Force (ASCAF) organizations, Human Systems Wing (HSW) at Brooks AFB (311 HSW/CX), 88th Air Base Wing (ABW), 74th Medical Group, 645th Material Squadron, and Air Force Reserve Command office (HQ AFRC/XPR), regardless of geographical location. It is applicable to A&AS acquired from all contract sources (ASC and non-ASC) that support ASC organizations.

SUMMARY OF REVISIONS

This update of ASCI 63-401 enhances the A&AS definition and expands and clarifies the A&AS exemption categories. It also provides more details on the requirements for proper management and reporting of A&AS as well as limitations on the source and allocation of A&AS. This includes prescribed waiver processes for use of non-ASC authorized contracting sources and increases to A&AS ceilings. This document incorporates the Determination / Decision Document (DDD) requirement to search for organic manpower prior to authorizing contract support. This document expands both organizational and personnel responsibilities and modifies the list of terms and definitions for greater clarification and better understanding.

SECTIO N		PAGE
1.	Guidelines and Restrictions for the Use of A&AS	. 3
2.	What is A&AS?	. 3
3.	A&AS Reporting	. 4
4.	A&AS PB-15 Reporting Exemptions and Exclusions	. 6
5.	Authorized A&AS Contract Sources	. 9
6.	A&AS CME and Dollar Ceilings	. 9
7.	How is A&AS Support Acquired for New Work/New Start Programs?	. 10
8.	Waiver Process for Requesting A&AS and Adjustment to Two-Letter	. 11
9.	Waiver Process for Requesting Non-ASC/CDS (311 HSW) Contract Sup	. 11
10.	A&AS Management Plan	. 12
11.	Funding Document Identification of A&AS	. 12
12.	Organizational Funding Accountability/Responsibility for A&AS	. 13
13.	Determination/Decision Document (DDD)	. 13
14.	ASC/CD Responsibilities	. 15
15.	ASC/CDS and 311 HSW/CX A&AS Management Responsibilities	. 16
16.	A&AS Contracting Office Responsibilities	. 17
17.	ASC Functional Home Office/Resource Management Office Responsibilities	. 17
18.	Requiring Organization Responsibilities	. 18
19.	Manpower Office (ASC/MQ) Responsibilities	. 18
20.	ASC/PKW Responsibilities	. 19
21.	88th CG Responsibilities	. 19
22.	FAC/COR Responsibilities	. 20
23.	FAE/QAE Responsibilities	. 20
24.	Organizational A&AS Focal Point Responsibilities	. 21
25.	Federally Funded Research and Development Center (FFRDC) Support	. 21
26.	Relevant Internet World Wide Web Sites	. 21
Attachment	1—GLOSSARY OF REFERENCES	23
Attachment 2 GLOSSARY OF ABREVIATIONS AND ACRONYMS 24		
Attachment 3 CLOSSARY OF TERMS		26

1. Guidelines and Restrictions for the Use of A&AS

- 1.1. Use of A&AS is an appropriate method to acquire needed skills not available within ASC organizations. When using A&AS support, each ASC organization should seek maximum effectiveness with the minimum number of A&AS contracted resources to accomplish program mission objectives. Each organization must determine the appropriate level(s) of expertise and/or skill(s) required to accomplish the task objectives and ensure satisfactory contractor performance through proper oversight and contractor performance reporting. It is incumbent upon all ASC organizations to understand the ground rules provided herein and to be compliant with the provisions of this instruction and all applicable A&AS guidance.
- 1.2. Public Law 102-394, as implemented in Office of Management and Budget (OMB) Circular A-11, changed the reporting requirements for contracted services. This change established a category called "consulting services" to be reported each fiscal year. A&AS is a subset of this category. All ASC organizations must manage and report A&AS as outlined in this instruction.
- 1.3. The Federal Workforce Restructure Act of 1994 coupled with the most recent Department of Defense (DoD) civilian resource guidance levied dramatic civilian workforce reductions on the Air Force. The Act precludes any increase to service contracts unless such contracts are shown to be financially advantageous to the Government. To ensure compliance with the law and the intent of the DoD, the Air Force A&AS Director (SAF/AQX) imposed limits on the use of A&AS contracts for Fiscal Year (FY) 95 through FY01. During this period SAF/AQX limited its use to a level not to exceed A&AS dollars obligated in FY94 adjusted for inflation. Management of individual ASC two-letter ceiling allocations ensures overall ASC compliance with the DoD ceiling limitation.
- 1.4. Policy contained in DoDD 4205.2, Federal Acquisition Regulation (FAR) 37.203, and 5 United States Code (U.S.C.) 3109 levies additional A&AS guidelines. The use of contractor personnel shall not dilute or offset reductions in authorized organic manpower resources. A&AS shall not be used to bypass or undermine personnel ceilings, pay limitations, or competitive employment procedures. A&AS shall not be used to augment the organic workforce, especially during this era of workforce reduction. Its use is only to procure skills and expertise not available organically, or to meet short term surge requirements (typically one year or less).

2. What is A&AS?

- 2.1. A&AS support is acquired by contract from non-governmental sources to support or improve organization policy development, decision-making, management, and administration. It is used to support program and/or project management and administration. It is also used to provide management and support services for research and development (R&D) activities and to provide engineering and technical support services or to improve the effectiveness of management processes or procedures. Such services may take the form of information, advice, opinions, alternatives, analyses, evaluations, recommendations, training, and technical support.
- 2.2. The following list of A&AS examples depict typical kinds of support:
 - 2.2.1. Obtaining specialized opinions and professional and technical advice or assistance not readily available within the DoD or another government agency.
 - 2.2.2. Obtaining outside points of view to enhance understanding or develop alternative positions and/or solutions to various issues or problem areas.

- 2.2.3. Obtaining reviews, analyses, appraisals, or summary information on subjects of highly specialized areas of concern.
- 2.2.4. Obtaining improved program and/or project management of DoD systems or programs through advice; assistance or training to include program monitoring; resource management, planning, and programming; and milestone schedule tracking.
- 2.2.5. Supporting or improving the management and/or administration of DoD organizations.
- 2.2.6. Providing advice for the efficient and/or effective operation of fielded weapons, weapon support and communications systems, equipment, or components.
- 2.2.7. Assisting in the introduction and transfer of engineering and technical knowledge for fielded systems, equipment, and components. For example, contracted technical representatives providing information, instruction, or hands-on training associated with the operation of such systems.
- 2.3. Examples of A&AS that support ASC organizations include:
 - 2.3.1. Acquisition support functions such as acquisition management, acquisition logistics, test and evaluation, management operations, government furnished equipment management, acquisition security, engineering, manufacturing and quality assurance, configuration and data management, financial management, and administrative support.
 - 2.3.2. Litigation support employing the functions listed in paragraph 2.3.1 as well as providing support such as data research, technical data interpreters, digital data conversion, and preparation of litigation material and/or briefings for legal review.
 - 2.3.3. Independent Verification and Validation (IV&V) is a systematic evaluation of software and associated products and activities by a third party agency that is not responsible for developing the product or performing the activities being evaluated.
 - 2.3.4. Contract Engineering and Technical Services (CETS) provides Air Force units with full engineering support and instruction, technical advice and training in the installation, operation and maintenance of aircraft and aerospace equipment, weapon systems, and ground based communications, radar, and computer equipment. More information on CETS may be obtained in AFI 21-110, "Engineering and Technical Services" (31 Aug 94).
 - 2.3.5. Non-routine Information Technology (previously referred to as "non-routine Automated Data Processing") computer support such as inputting and maintaining spreadsheets that provide system acquisition functional information and support. This may include producing such things as configuration management status accounting reports, deficiency reports, milestone schedules, engineering change proposal tracking or other program related documentation including SPO organizational information.
 - 2.3.6. A&AS support acquired from typically non-A&AS type contracts such as Operations and Maintenance (O&M) contracts, supply contracts, Defense Technical Information Center (DTIC) contracts, etc. Reference expanded list of contracts provided in paragraph 3.1.

3. A&AS Reporting

3.1. ASC organizations must report all A&AS contracted obligations (contracted man-year equivalents [CME] and A&AS dollars) in accordance with Public Law 102-394, as implemented in OMB

- Circular A-11. ASC organizations must report A&AS usage acquired from ASC/CDS contracts (and 311 HSW contracts after 1 Oct 98), as well as ancillary A&AS support acquired from, but not limited to, service contracts; supply contracts; General Services Administration Schedule (GSA) contracts, Federally Funded Research and Development Center (FFRDC) contracts, Government-Owned Contractor-Operated (GOCO) contracts, Defense Technical Information Center (DTIC) or Information Analysis Center (IAC) contracts, R&D contracts; operations and maintenance (O&M) contracts; contracts administered and/or managed by SPO, ALCs, Laboratories, AFMC, USAF, DoD, DoJ, prime/sub weapon system contractor, or any other contractual vehicle providing A&AS support. Any organization that supplements manpower by A&AS contract support (regardless of type or origin of contract, or source of funds), must identify and report this support to ASC/CDS.
- 3.2. All ASC unclassified A&AS support must be reported by each Two-letter organization to ASC/CDS. ASC/CDS conducts a monthly A&AS data call for collection of A&AS contracted obligations resulting from the preceding month's contract actions. This collective A&AS data is used for PB-15 and A&AS Management Plan reporting as well as for supporting various CME and/or financial analyses tasked through ASC manpower, financial management, contracting directorate offices, HQ AFMC, and SAF. ASC/CDSY inputs the contract obligation information into the A&AS database each month for customers who use ASC/CDS A&AS contracts. ASC organizations that use other A&AS contract sources must report their monthly A&AS obligations to ASC/CDS for inclusion into the ASC A&AS database.
- 3.3. All 311 HSW A&AS support must be reported to 311 HSW/CX and ASC/CDSY, in-turn.
- 3.4. A&AS ceiling usage is accrued as a result of contract obligations (dollars and CMEs) that occur within each respective fiscal year, rather than when the A&AS effort is actually performed. A hypothetical example of this situation is when an A&AS effort is placed on contract and fully funded at the beginning of the task order on 30 Sep 98 (FY98). However, the effort's performance actually occurs the next fiscal year (FY99). For ceiling management and reporting purposes, this example would count against the FY98 ceiling rather than the FY99 ceiling. This is because the A&AS effort was contractually obligated in FY98.
- 3.5. All A&AS support must be grouped into reporting categories for purposes of supporting the annual A&AS President's Budget Exhibit (PB-15) report, the A&AS Management Plan, and the DoD accounting system. Once a service has been determined to be A&AS, it must be categorized into one of the following categories. These categories are used to group advisory and assistance services for reporting A&AS contract actions in the annual A&AS budget exhibit and in the DoD accounting system. A&AS codes can be obtained from the financial manager, or equivalent. (See AFI 65-601, Volume I, *Budget Guidance and Procedures*, Chapter 3.) These A&AS reporting categories are: (1) Management and Professional Support Services (M&PSS), (2) Studies, Analyses and Evaluations (SA&E), and (3) Engineering and Technical Services (E&TS).
 - 3.5.1. Management and Professional Support Services (M&PSS). Requirements for contractual services that provide assistance, advice, or training for the efficient and effective management and operation of organizations, activities (including management and support services for R&D activities), or systems. These services are normally closely related to the basic responsibilities and mission of the agency contracting for the services. It includes efforts that support or contribute to improved organization of program management, logistics management, project monitoring and reporting, data collection, budgeting, accounting, performance auditing, and administrative or

technical support for conferences and training programs. It excludes auditing of financial statements.

- 3.5.2. Studies, Analyses, and Evaluations (SA&E). Requirements for contractual services that provide organized analytic assessments and/or evaluations in support of policy development, decision-making, management, or administration. This includes studies in support of R&D activities. Also it includes requirements for models, methodologies, and related software supporting studies, analyses, or evaluations.
- 3.5.3. Engineering and Technical Services (E&TS). Requirements for contractual services used to support the program office during the acquisition cycle by providing such services as systems engineering and technical direction (FAR 9.505-1(b)) to ensure the effective operation and maintenance of a weapon system or major system as defined in the OMB Circular No. A-109 or to provide direct support of a weapon system that is essential to R&D, production, or maintenance of the system.
- 3.6. All ASC classified A&AS support must be reported directly to SAF/AQL via a specific tasker for PB-15 reporting. Only the classified data aspects of the A&AS information are exempt from being reported through normal ASC A&AS channels (ref. Paras. 3.2 and 3.3).

4. A&AS PB-15 Reporting Exemptions and Exclusions

- 4.1. The following Group 1 contracted activities are A&AS, but are exempted from A&AS reporting and preparation of DDDs:
 - 4.1.1. Activities reviewed and/or acquired according to OMB Circular A-76, (for example, base operating support functions such as grounds maintenance, family housing maintenance, other civil engineering functions, food services, and other base services functions). In other words, functions considered "Commercial Activities."
 - 4.1.2. Clinical and medical services for direct health care.
 - 4.1.3. Routine Information Technology (IT) services, which was previously known as automated data processing (ADP) and telecommunication services (for example, standard computer operations maintenance or help-desk services) unless they are an integral part of A&AS contracts; printing services; and direct advertising (media services), as defined in FAR Part 39 and OMB Circular A-130, Management of Federal Information Resources. Obligations for services associated with maintenance (including maintenance that is part of a rental contract) of both IT and other computer hardware or software and related training and technical assistance, when significant and readily identifiable in the contract or billing, are reported under OMB Circular A-11 Object Class 25.7, Operations and Maintenance of Equipment. Obligations for services associated with the initial installation of equipment (IT and telecommunication equipment, custom and off-the-shelf software, and other computers and computer equipment of a durable nature (in service for one year or longer) are reported under OMB Circular A-11, Object Class 31.0, Equipment. Obligations for rental of IT and telecommunications hardware and software are reported under OMB Circular A-11, Object Class 23.3, Communications, Utilities, and Miscellaneous Charges. Additional information is in FAR Subpart 37.2 (FAC 90-33, 1 Oct 95). Other examples of routine IT exemptions for A&AS include:
 - 4.1.4. Embedded systems software, when the effort is performed by the prime (or sub vendor) as part of the weapon system development contract.

- 4.1.5. Routine (on-going) office automation and management systems.
- 4.1.6. Basic operation and management contracts for Government-Owned, Contractor-Operated (GOCO) facilities. *NOTE:* Any contract and/or task order action meeting the A&AS definition and procured under a GOCO contract, shall come under the purview of A&AS policies and this Instruction.
- 4.1.7. Architectural and engineering services for construction and construction management services procured in accordance with FAR Part 36.
- 4.1.8. Research on theoretical mathematics and basic medical, biological, physical, social, psychological, or other phenomena.
- 4.1.9. Training obtained for individual professional development (This exemption is only applicable to training provided through a private college or university directed toward a particular degree.) It does not refer to topical training provided by contract for Air Force personnel or to the development of computer-based training programs, both of which are classified as A&AS.
- 4.1.10. Auctioneers, realty-brokers, appraisers, and surveyors.
- 4.2. The following Group 2 A&AS activities are exempt from reporting A&AS obligations, but require an approved DDD:
 - 4.2.1. Services supporting the policy development, management, and administration of the Foreign Military Sales (FMS) Program that is not paid for with funds appropriated by the US Congress (for example, FMS Case Funds). This exemption also applies when A&AS is funded with appropriated funds and reimbursed by the foreign customer. NOTE: Although FMS support is exempt from official A&AS reporting (PB-15), the A&AS dollar and CME obligations must be reported to ASC/CDS for Center data collection purposes.
 - 4.2.2. Defense Environmental Restoration Account (DERA) is a special transfer account established by Title 10, United States Code, Section 2703, to fund the services' cleanup programs established under the Defense Environmental Restoration Program. The services' cleanup programs seek to protect public health and the environment by cleaning up sites whose past activities created contamination from toxic and hazardous substances, low level radioactive materials, and petroleum, oil, and lubricants. The Air Force Installation Restoration Program (IRP) identifies, investigates, and cleans up contamination at active Air Force installations, Government-owned, contractor-operated facilities, off-site locations where contaminates might have migrated, third party sites, and sites that the Air Force formally owned or used. The Air Force IRP includes development, test, and evaluation of innovative and cost-effective cleanup technology and toxicological data collection. Program element code 78008 funds DERA.
- 4.3. The following group 3 activities are not A&AS, and therefore are not required to be reported, nor require DDDs. These examples of frequently used services are not an all-inclusive list:
 - 4.3.1. Weapon System Sustainment Contracts that provide contractor support for product improvement (reliability and maintainability), maintenance, and support of fielded weapon systems. This type of support may be broken down into the following categories:
 - 4.3.1.1. Contractor Logistics Support (CLS) CLS is a planned, <u>permanent contractor support</u> method to provide all or part of the ILS elements for a system, equipment, or item when fielded. CLS services can be used to support item management, configuration and data man-

agement, supply, distribution, repair, depot maintenance, operating command organizational maintenance (and other levels as negotiated), and many other operations and maintenance tasks normally performed by an organic support activity. CLS applications include the support of government-owned commercial off-the-shelf aircraft, missiles, and equipment; research and development prototypes converted to operational use; contract depot-purchased equipment maintenance (the contracting out of depot-repairable items by an Air Force depot); and other instances where AFMC organic life-cycle logistics support is not planned for various reasons. CLS are services budgeted and funded under EEIC 592 and reported under OMB Circular A-11, Object Class 25.7, *Operations and Maintenance of Equipment*. More information on CLS may be obtained in AFR 800-21, "Contractor Support for Systems and Equipment" (20 Mar 87), and AFI 63-111 (DRAFT), "Contractor Support for Systems and Equipment" (Jun 97).

- 4.3.1.2. Interim Contractor Support (ICS) ICS is a planned, temporary contractor support method to provide all or part of the ILS elements for a system, equipment, or item during the time period from first production article delivery until an organic support or a competitive CLS capability is achieved. There are generally only two reasons that justify the use of ICS. (1) The items to be supported, or items of support equipment have an unstable design, such that the projected cost of setting up organic capability at the time operational support is required is excessive, either because of the uncertainties in the type and level of support required or because of the risk that support resources will become obsolete, if procured too early. (2) The items to be supported, or items of support equipment, are design stable, but all or part of the resources required to establish an organic capability will not be available until after operational support is first required. ICS is services budgeted and funded under EEIC 585 and reported under OMB Circular A-11, Object Class 25.7, *Operation and Maintenance of Equipment*. More information on CLS may be obtained in AFR 800-21, "Contractor Support for Systems and Equipment" (20 Mar 87), and AFI 63-111 (DRAFT), "Contractor Support for Systems and Equipment" (Jun 97).
- 4.3.1.3. Sustaining Engineering Sustaining Engineering is a subset of Maintenance Engineering. Sustaining Engineering accounts for contractual costs of engineering efforts on systems, products, or materials required to resolve technical or supportability deficiencies revealed in operational service. Sustaining Engineering includes, but is not limited to, assessing deficiency indicators; defining the characteristics and cause of such deficiencies; determining the impact on the affected product; identifying and evaluating alternative solutions; determining the preferred solution; and designing, integrating, and validating the solution. This includes all associated contractual efforts (for example, engineering and technical data, modeling, simulation, and testing) that are integral to the completion of the overall engineering task. Sustaining Engineering are services budgeted and funded under EEIC 583 and reported under OMB Circular A-11, Object Class 25.7, *Operation and Maintenance of Equipment*. More information may be obtained in the AFMC Financial Management Handbook, chapter 96, "Sustaining Engineering Process" (20 Feb 97).
- 4.3.2. Test Range Operations / Test Center Contracts. The principle contract for the operation of a test range/center in which the (non-A&AS) contractor is responsible to conduct or perform day-to-day range operations and maintenance activities, systems engineering support for end-to-end weapon system analyses, primary range activities, or the entire test phase. This principle contractor functions in a capacity analogous to that of a prime weapon system contractor dur-

ing the engineering and manufacturing development phase of a system life cycle. *Note: Apart from this principle test range operations contract, the test center may have other contracts for management and support purposes that may be considered A&AS.*

- 4.3.3. Routine Administrative Services If the routine administrative services are provided on a "stand-alone" contract, they fall under OMB Circular A-11, Object Class 23.5, *Other Services*. An example is a basic contract that has a sole purpose of providing services such as typing, filing, copying, scheduling, or processing documentation through suspensing, tracking, reporting, searching, retrieving activities, etc.), unless they are an integral part of A&AS contracts.
- 4.3.4. Basic Research activities funded under Budget Program (BP) 61xxx (Technology Base), and BP 62xxx (Advanced Technology Development). This is reported under OMB Circular A-11, Object Class 25.5, Research and Development Contracts.
- 4.3.5. Peer Review Peer review work performed by other organizations (for example, National Academy of Sciences) and funded through a MIPR rather than through a contract is not considered A&AS.

5. Authorized A&AS Contract Sources

- 5.1. Unless otherwise approved by ASC/CD, all A&AS support required for ASCAF organizations must be contracted through Omnibus, Acquisition Logistics, and Financial Management contracts managed by ASC/CDS for Wright-Patterson AFB organizations. Similarly, 311 HSW/CX is the A&AS management office for Brooks AFB. ASC/PKW should be used for A&AS support that falls outside the scope of contracts managed by ASC/CDS, unless otherwise approved by ASC/CD.
 - 5.1.1. It is not recommended that A&AS support be acquired through the prime/sub weapon system contractor. This practice is known as "Blue Contracting" and should be avoided because this method of acquiring A&AS support is typically expensive, and is usually not reported because it is construed to be a "part of the prime weapon system contract". This method of contracting for A&AS through a prime weapon system contractor must follow the guidelines stated in paragraphs 5.1 and 5.2 before they may be used.
- 5.2. ASC requiring organizations must obtain ASC/CD waiver approval prior to contracting for ancillary A&AS support acquired from contract vehicles other than those listed in paragraph 5.1. Examples of these other A&AS contract sources are, (but not limited to), service contracts; supply contracts; GSA Schedule contracts, Federally Funded Research and Development Center (FFRDC) contracts, GOCO contracts, DTIC or IAC contracts, R&D contracts; O&M contracts; contracts administered and/or managed by SPO, ALCs, AFMC, USAF, Laboratories, DoD, DoJ, prime/sub weapon system contractor, or any other contractual vehicle providing A&AS support other than those mentioned in paragraph 5.1 above.

6. A&AS CME and Dollar Ceilings

6.1. A&AS CME and dollar ceilings were established as a result of The Federal Workforce Restructure Act of 1994, Public Law 103-226 (H.R.3345), March 30, 1994 This legislation limits the use of A&AS contracts for the period FY95 - FY01, to a level not to exceed A&AS dollars obligated in FY94, adjusted for inflation. Following the passage of this legislation, SAF/AQX directed each Center to establish an A&AS baseline through identification of A&AS CMEs and dollars that were contractually obligated during the FY94 period. The ASC FY94 dollar ceilings were predicated on labor,

travel, material, equipment, and other associated A&AS contract obligations. ASC A&AS ceilings are applicable to classified and unclassified support.

- 6.1.1. ASC A&AS ceilings are applicable to any organization that supplements it's organizational manpower with A&AS contract support, or supports it's mission through the use of A&AS (regardless of type or origin of contract, or source of funds).
- 6.2. The ASC Executive Director (ASC/CD) allocates A&AS dollar and CME ceilings at the beginning of the fiscal year for all ASC organizations. Following the DoD organic manpower draw-down policy, ASC mandates yearly reduction of A&AS usage. At the beginning of the fiscal year, ASC/CDS will distribute A&AS two-letter ceiling information. Unless approved otherwise, each two-letter organizational ceiling will be automatically reduced 5% from the previous fiscal year level.
- 6.3. A&AS ceiling usage is accrued as a result of contract obligations (dollars and CMEs) that occur within each respective fiscal year, rather than when the A&AS effort is actually performed. A hypothetical example of this situation is that an A&AS effort was placed on contract (and fully funded at the beginning of the task order) on 30 Sep 98, but the A&AS performance actually occurred the next fiscal year (FY99). For ceiling management and reporting purposes, this example would count against the FY98 ceiling rather than the FY99 ceiling. This is because the A&AS effort was contractually obligated in FY98.
- 6.4. The A&AS ceiling for Brooks AFB organizations will be managed by 311 HSW/CX at macro level, although respective 311 HSW two-letter organizations (and their associated A&AS ceilings) will be broken out on the ASC/CDS A&AS database spreadsheet.
- 6.5. A&AS approved for litigation support activities will be broken out by ASC/CDS and shown as a separate ceiling for each two-letter organization. This separate A&AS ceiling tracking requirement for litigation support is due to the difficulty of programs to forecast litigation support due to the volatility of this type support. ASC also desires to track this support to determine what (if any) affect litigation support requirements may have on long term program costs, schedules, missions, and acquisition reform initiatives.
- 6.6. The requirement for 1 CME = 1764 hours was directed by SAF/XP letter (19 Jun 97). The 1764 man-hour factor was mandated to enable a common measurement between contracted support and organic manpower strengths shown on the Unit Manning Document to support various manpower drills requested by SAF and HQ AFMC. Following this policy implementation, all ASC A&AS two-letter CME ceilings were adjusted up 13% by ASC/CDS to compensate for the actual work effort that would be reduced as a result of the numeric conversion. As a result of this change, organizations should recognize that it will now take 1.13 CMEs to perform the same effort previously performed using 2000 hours as a CME. In other words, if a contractor proposes 2000 hours to perform an effort, the ASC organization must have an A&AS ceiling equal to at least 1.13 CMEs.
- 6.7. All A&AS requirements pertaining to proper management, tracking, reporting, and ceiling allocation mentioned within this instruction fully apply to classified programs/intelligence programs/special access requirement (SAR) programs. However, these programs are subject to reporting classified aspects of A&AS through specified reporting channels (ref. para. 3.6.).
- 6.8. Prior to contracting for any A&AS support, ASC organizations must ensure, through their respective A&AS Focal Point, that sufficient A&AS ceiling is available.

7. How is A&AS Support Acquired for New Work/New Start Programs?

- 7.1. Two-letter organizations may request additional resources directly from the appropriate functional home office to meet a surge or New Work requirement. The functional home office will perform an analysis of the requirement(s) and will identify sources to meet those requirements. For multi-functional requirements, ASC/HR will facilitate the request for resources.
- 7.2. If the organic resources are not readily available, A&AS support may be approved for an interim period, not to exceed twelve months. In this event, the limited interim support will not be counted against the requiring organization two-letter ceiling, but will count against the overall ASC ceiling and will be used from the ASC A&AS management reserve. A&AS support must be approved by ASC/CD (ref. Para. 8 below), and is typically not part of the ASC resource management process.

8. Waiver Process for Requesting A&AS and Adjustment to Two-Letter A&AS Ceiling

- 8.1. Requests for A&AS ceiling adjustment must be submitted by the requiring two-letter organization to ASC/CD. Unless otherwise stipulated by the two-letter requiring organization, and approved by ASC/CD, all CME ceilings and dollar ceilings will be reduced 5% per year for the out-years, (dollars adjusted for inflation). Both CME and dollar ceiling requests need to address the current year and out-year A&AS requirements over the next five fiscal years. It is recommended that the two-letter requiring organization meet with ASC/CDS (311 HSW/CX) to discuss the waiver request. Following these preliminary discussions, the two-letter and ASC/CDS will meet with ASC/CD to seek approval. It is recommended that the two-letter office provide a memo or briefing charts (one or two slides) to document the waiver request. As a minimum, the request should contain rationale for ceiling adjustment (including CMEs and dollars), if deviation from 5% reduction per year is required, impact to program, new start effort, delayed effort, etc. If the waiver request is approved, ASC/CD will sign and date the waiver documentation. This signed waiver document will serve as formal waiver approval. If the A&AS request is approved, the ASC/CDSY A&AS ceiling manager will make the necessary changes to the two-letter ceiling in the ASC/CDS A&AS database. A signed and dated copy of the waiver is to be provided to ASC/CDS (311 HSW/CX).
- 8.2. Approval for A&AS ceiling adjustment is contingent upon the following influencing factors:
 - 8.2.1. Ensuring the staffing of A&AS resources does not circumvent or violate the Federal Workforce drawdown.
 - 8.2.2. Ensuring sufficient government resources are available for oversight and management of any increased A&AS support.
 - 8.2.3. Approved organic support that is not available for immediate staffing and/or reallocation that might result in interim A&AS support for less than 12 month period.
 - 8.2.4. Non-availability of additional A&AS resources due to insufficient ASC ceiling management reserve and/or impact as a result of the 5 percent per year A&AS reduction.
 - 8.2.5. A&AS reductions imposed by DoD, and the need to reallocate and/or redistribute A&AS support across ASC programs.
 - 8.2.6. Coordination is also required from the two-letter organization (including the A&AS focal point) relinquishing A&AS ceiling when transfer of A&AS ceiling is requested from one two-letter organization to another.

9. Waiver Process for Requesting Non-ASC/CDS (311 HSW) Contract Sup port

- 9.1. Authorization to use ancillary (non-ASC/CDS or non- 311 HSW) A&AS contracts requires ASC/CDS or 311 HSW/CX coordination (depending on the specific function and/or effort to be performed), and ASC/CD approval. Approval to use ancillary A&AS contracts is on a by-exception basis, typically for a one year period or less.
- 9.2. Requests to use non-ASC/CDS (311 HSW) contract support must be submitted by the requiring two-letter organization to ASC/CD. Unless otherwise stipulated by the two-letter requiring organization, and approved by ASC/CD, all estimated CME and dollar amounts need to be shown as 5% per year reduction for the out-years, (dollars adjusted for inflation). It is recommended that the two-letter requiring organization meet with ASC/CDS (311 HSW/CX) to discuss the waiver request. Following these preliminary discussions, the two-letter and ASC/CDS will meet with ASC/CD to seek approval. It is recommended that the two-letter office provide a memo or briefing charts (one or two slides) to document the waiver request. As a minimum, the request should contain rationale for why ASC/CDS (311 HSW) contracts are unable to support the customer's requirements, level of support (e.g., total number of CMEs, type/skill level of support), estimated dollar value, duration of waiver, and plan/schedule to transition to ASC/CDS (311 HSW) contract. If the waiver request is approved, ASC/CD will sign and date the waiver documentation. This signed waiver document will serve as formal waiver approval. A signed and dated copy of the waiver is to be provided to ASC/CDS (311 HSW/CX).

10. A&AS Management Plan

- 10.1. An A&AS Management Plan is required by DoDD 4205.2. ASC/CDS is responsible for preparation of the required annual management plan and relies on actual information and overall ASC management goals for development and execution of the ASC plan. The management plan includes the following information for the respective current fiscal year and the following two fiscal out-years:
 - 10.1.1. A summary of planned actions and dollars by each A&AS category. Within the current fiscal year, ASC/CDS typically reports planned actions as the difference between known contracted A&AS obligations to date, and the respective two-letter fiscal A&AS ceiling. Out-year projections for each two-letter organization are based on a 5% per year A&AS ceiling decrement (dollars adjusted for inflation), unless approved by ASC/CD and shown otherwise in the ASC A&AS database.
 - 10.1.2. An explanation for any significant changes between any two consecutive years. Examples include revised ceilings due to the unpredictability of litigation support, new starts resulting from new programs or revised manpower, or cancellation of programs.
 - 10.1.3. For the budget year only, a summary of actual actions executed and dollars obligated. This information is acquired directly from the ASC/CDS database (of ASC A&AS contracted obligations to date), which is updated monthly.
 - 10.1.4. The A&AS Management Plan is prepared by ASC/CDS for ASC/CD approval, and submitted to the DoD Director through HQ AFMC/DRM and SAF/AQX, in-turn. These reports are typically submitted in conjunction with the President's Budget (approximately 15 Feb).

11. Funding Document Identification of A&AS

11.1. Public Law 102-394 as implemented in OMB Circular A-11, requires all projections and obligations for A&AS be tracked and reported through the DoD accounting system. All pre-contractual

(<u>planning</u> purchase request) and contractual (<u>certified</u> purchase request) funding documents used to procure A&AS must contain a statement on the face of the document signifying, "THIS IS AN A&AS REQUIREMENT." The funding document must also contain an Element of Expense / Investment Code (EEIC) in the fund cite depicting the functional type of A&AS (ref. ASC/CDS web site http://www.asc.wpafb.af.mil/base/asc/cds/title.htm). In addition, the funding document must also identify the A&AS categories to be procured, for example, (1) Management and Professional Support Services, (2) Studies, Analysis and Evaluations, (3) Engineering and Technical Services (ref. Para. 3.5).

12. Organizational Funding Accountability/Responsibility for A&AS

- 12.1. When an ASC two-letter organization receives funds from a non-ASC organization and procures A&AS support with these funds, two events must occur:
 - 12.1.1. Per DoDD 4205.2 reporting instructions for PB-15, the organization that budgets for the A&AS that is procured has the responsibility to report the obligations in each fiscal year in it's annual PB-15 report, (independent of the organization that puts the effort on contract or uses the support, the contract vehicle used, or location of the A&AS support). In other words, the receiving ASC two-letter organization must inform the non-ASC funding source of the amount of A&AS that was contractually obligated (A&AS dollars and CMEs). The non-ASC organization, in-turn, has the responsibility to report the A&AS obligations via it's respective PB-15 reporting channels. Hence, A&AS funding sent to a non-ASC organization from an ASC two-letter organization follows the same rules as above. In other words, if the ASC two-letter organization is the funding source, it will be required to report the A&AS obligations, that were contracted for by the non-ASC organization, to ASC/CDSY for inclusion in the ASC annual PB-15 report.
 - 12.1.2. In addition to the DoDD requirements stated in the preceding paragraph, ASCI 63-401 requires all A&AS obligations (dollars and CMEs) be reported to ASC/CDSY, (includes A&AS funded from ASC and non-ASC sources). If the funded (ASC and non-ASC) A&AS procurement supports the ASC two-letter program / mission, the A&AS dollars and CMEs will be counted against the ASC two-letter ceiling. When ASC funds are sent to a non-ASC organization, and do not support the ASC two-letter program / mission, the A&AS obligations are subject to the PB-15 reporting requirements described in paragraph 12.1.1, but will not be counted against the ASC two-letter A&AS ceiling. For customers using ASC/CDS contracts, the reporting requirements identified in paragraphs 12.1.1 and 12.1.2 are a one-step process performed by ASC/CDS.
- 12.2. Any ASC organization that intends to send funds to a non-ASC organization to procure A&AS support for an ASC mission must first obtain approval from ASC/CD (ref. Para. 9.1). If a non-ASC contract is used for A&AS support, the funding document must have the appropriate A&AS codes and the ASC organization must count and report the effort against its respective dollar and CME ceilings to ASC/CDSY.

13. Determination/Decision Document (DDD)

13.1. Prior to contracting for any A&AS support, pre-Request For Proposal (RFP), it must be determined that personnel with adequate skills and capabilities are/are not readily available within DoD and associated organizations to support the contemplated effort. This is accomplished through a query (search) process requested by the requiring activity and performed by the functional home office functional process resource owner. The Determination/Decision Document is used to record the query, the associated finding and supporting information, certification statements, and the appro-

priate approval authority. Approval authority thresholds are outlined in paragraph 13.5. Every A&AS contracted action must have a completed and approved DDD in the contract file.

- 13.2. The conditions under which a DDD is required include the following:
 - 13.2.1. All requiring organizations which request A&AS support using ASC and non-ASC contracts/task orders. *Note: DDDs for ASC and non-ASC contracts must be processed through ASC functional home offices (or functional process resource owner) if the A&AS supports the ASC organization/mission.*
 - 13.2.2. Task order modifications to increase CME level of support.
 - 13.2.3. Task order modifications to change any labor category requirement that was not previously identified on the original DDD (for example, convert a senior level support to junior level support).
 - 13.2.4. Extension of the period of performance.
 - 13.2.5. Moving contract funds from travel or material CLIN to labor CLIN.
 - 13.2.6. No-cost extensions, (using unused contract dollars, or over estimated funds on contract to buy additional labor, or to extend the task order for a longer period of time), require an additional DDD. This is because of the additional CME that would be procured. However, if the extension period is for only a very short period of time and the extension does not support Initial Contract Award Proposal Evaluation and Analysis (ICAPEA), it may not be advantageous (timely) for the requiring organization to process a DDD. The intent is to process the DDD, given there is a fair and reasonable amount of time for this processing. Consideration should be given to the requiring organization to preclude any adverse impact to the program that might result from failure to approve the contract extension in the absence of an approved DDD for the extension. This type of action warrants review and approval from the A&AS contract Contracting Officer with supporting documentation for the contract file.

13.3. Every DDD must address the following:

- 13.3.1. A short description of the requirement, the number of CMEs (1 CME = 1764 hours), types of skills needed (Govt. grade/series equivalent), A&AS contractor functional title(s)/skill level/experience required, estimated contract value (labor, travel, materials, other costs), and period of performance.
- 13.3.2. Will the proposed A&AS support (1) Initial Contract Award Proposal Evaluation and Analysis (ICAPEA), which includes support of source selection and sole source selection determination activities, and/or (2) general A&AS (non-ICAPEA)? Note: Queries for ICAPEA and general A&AS support should be made to other organizations/agencies that are already familiar with the program and associated technologies to minimize the "learning curve." It is recognized that the requiring activity (or functional process resource owner) will not be able to contact every AFMC organization for available resources, but good judgment and "due diligence" should be exercised.
 - 13.3.2.1. ICAPEA requires a search be conducted at (1) the requiring activity's center (ASC), (2) one other AFMC center or HQ AFMC, and (3) one other Federal Agency outside the Air Force (for example, Army, Navy, NASA, etc.)
 - 13.3.2.2. General A&AS (non-ICAPEA) requires a search be conducted at (1) the requiring

activity's center (ASC), and (2) one other AFMC center or HQ AFMC.

- 13.4. DDD Certifications include the following:
 - 13.4.1. Requiring organization The A&AS effort will not be performing inherently governmental functions.
 - 13.4.2. Functional home office (or functional process resource owner) (1) The A&AS support will not circumvent personnel ceilings; (2) the A&AS will not replace displaced government personnel (which is stated in the FAR as no increase to service contracts); or (3) the A&AS will replace displaced government personnel, but is determined to be financially advantageous to the Federal Government. *Note: Cost comparisons are required if in-house personnel are identified and the contract estimate is equal to, or over \$100,000.*
- 13.5. DDD approval authority is based on the dollar thresholds that reflects the estimated value of the total A&AS requirement, to include options. The DDD dollar thresholds and respective approval levels are:
 - 13.5.1. Less than \$250,000 Designated official in ASC/EN/FM/PK/SY, or 311 HSW
 - 13.5.2. \$250,000 \$14,999,999 SES/General Officer in ASC/EN/FM/SY, 74 MG/CC, or 311 HSW
 - 13.5.3. \$15,000,000 \$49,999,999 ASC/CD.
 - 13.5.3.1. ASC/CD is also DDD approval authority for \$250,000 \$14,999,999 for ASC organizations that do not have an SES/General Officer to approve the DDD.
 - 13.5.4. \$50,000,000 \$99,999,999 HQ AFMC/DR.
 - 13.5.5. \$100,000,000 or greater SAF/AQX.
- 13.6. The ASC/CC policy letter addressing implementation of DDDs, the DDD template, and DDD instructions are provided in the ASC/CDS web site (http://www.asc.wpafb.af.mil/base/asc/cds/title.htm).
- 13.7. HQ AFMC and ASC DDD Focal Point lists have been established to aid requiring organizations (functional home offices or functional process resource owners) in the query (search) process. The DDD Focal Point lists is available on the ASC/CDS web site (http://www.asc.wpafb.af.mil/base/asc/cds/title.htm) and provides an avenue to quickly locate the appropriate organization/office to respond to the query.

14. ASC/CD Responsibilities

- 14.1. ASC/CD has overall responsibility for implementing policy, procedures and oversight of all A&AS at ASC and is the designated ASC A&AS Focal Point.
- 14.2. Establish a management organization for A&AS.
- 14.3. Ensure policies and procedures are consistent with the FAR as supplemented, DoD Directive 4205.2, AFI 63-401, and other regulatory guidance.
- 14.4. Ensure ASC/CDS maintains the ASC A&AS Management Plan. This document is to be reviewed and updated annually (Feb), and provided to HQ AFMC/DRM.

- 14.5. Review and approve ASC's annual A&AS Presidential Budget Exhibit (PB-15) Report. This report is submitted through HQ AFMC/DRM to SAF/AQX in August of each year.
- 14.6. Ensure all ASC personnel involved with A&AS are trained to identify, acquire, and manage A&AS according to DoD Directive 5010.38, *Internal Management Control Program*.
- 14.7. Determine corporate approach to A&AS allocations, reallocations, or reductions.
- 14.8. Determine fiscal year A&AS allocation in both CMEs and dollars to all ASC two-letter organizations based on recommendations from the different manpower allocation processes (that is, the manpower allocation exercise for the acquisition organizations, etc.)
- 14.9. Review and approve DDDs when required, for anticipated contract values ranging from \$250,000 up to \$50,000,000.

15. ASC/CDS and 311 HSW/CX A&AS Management Responsibilities

- 15.1. Have overall responsibility for implementation of procedures and oversight of ASC A&AS. Report ASC A&AS status as required to ASC/CD.
- 15.2. Ensure contracted services containing A&AS are in conformance with FAR 37.207, "Service Contracts" DoDD 4205.2, "Acquiring and Managing A&AS", and AFI 63-401, "ASC Management of A&AS."
- 15.3. Track and report all ASC A&AS usage in CME and dollars for all ASC organizations and maintain the A&AS data base.
- 15.4. Prepare and coordinate the A&AS budget submission with the organization A&AS focal point to ensure an accurate submission to ASC/CDS for consolidation.
- 15.5. Support the ASC manpower allocation exercises hosted by ASC/HR and the manpower office (ASC/MQ) for contract manpower equivalent exercises.
- 15.6. Assist the organizational A&AS focal points concerning any policy or procedures within this instruction.
- 15.7. Implement and maintain the ASC A&AS Management Plan.
- 15.8. Provide A&AS training, in concert with ASC/PK, A&AS focal points, functional area chiefs (FAC), contracting officer's representatives (COR), quality assurance evaluators (QAE), functional area evaluators (FAE), and contractors.
- 15.9. Disseminate A&AS related policy received from the Office of Federal Procurement Policy (OFPP), DoD, Air Force, SAF/AQ, and HQ AFMC.
- 15.10. Respond to A&AS inspections, audits, and other taskings related to A&AS.
- 15.11. Provide ASC organizations with lessons learned from A&AS inspections, audits, working groups, etc.
- 15.12. Consolidate all ASC A&AS submittals provided by the A&AS focal points to prepare the PB-15 Annual A&AS Budget Exhibit. Coordinate the package with ASC/FMB, obtain approval from ASC/CD, and submit the PB-15 Annual A&AS Budget Exhibit.
- 15.13. Administer and manage contract requirements for all ASC customers utilizing ASC/CDS or 311 HSW A&AS contracts.

16. A&AS Contracting Office Responsibilities

- 16.1. This section is applicable to ASC/CDS, 311 HSW, and requiring organizations who may be authorized by ASC/CD to contract for A&AS support.
- 16.2. Provide and document training for the COs, buyers, FACs/CORs, and FAEs/QAEs, to ensure they are adequately trained to perform pre-award and post-award assignments.
- 16.3. Establish a review process to ensure all orders and modifications are within scope.
- 16.4. Distribute contracts, task orders, and modifications upon award to the FAC/COR, FAE/QAE, ASC/MQ, and the requiring activity, as a minimum.
- 16.5. Ensure the CO with overall contract responsibility has full visibility and tracking of orders and obligated funds.
- 16.6. Establish periodic management reviews of services and manpower support contracts to verify that administrative procedures (that is, ordering, surveillance, and funding) are working properly.
- 16.7. Ensure the requiring organization has developed a surveillance plan that has been approved by the contracting officer.
- 16.8. Review the work statement to determine if the requirements contain A&AS. If the work statement contains A&AS effort without other supporting documentation (for example, funding document signifying the effort is A&AS, DDD, surveillance plan, etc.), return the requirements package to the originator to be re-accomplished.
- 16.9. Review funding documents for proper A&AS annotation/codes as applicable (for example, EEIC alpha-numeric code designator for the type of A&AS).
- 16.10. Ensure FAEs/QAEs are identified in writing and provide a copy of each specific FAE/QAE designation to the contractor.
- 16.11. Ensure DD Form 350 is properly coded in the FPDS (DD Form 350, Block E1.

17. ASC Functional Home Office/Resource Management Office Responsibili ties

- 17.1. Applicable to ASC functional home offices (ASC/EN, FM, PK, SY) and other ASC and 311 HSW resource management offices.
- 17.2. According to the Federal Workforce Restructuring Act, certify that A&AS contracts will not be used to replace/offset organic authorizations eliminated as a result of the federal workforce draw down. This will be done for the initial contract and for each task order/delivery order, or contract action, by approving a DDD.
- 17.3. Designate a FAC to manage A&AS contracts within ASC/CDS (except ASC/PK).
- 17.4. Support Source Selection activities for applicable functional A&AS contracts.
- 17.5. Prepare and provide authorization change requests (ACR) to ASC/MQ for functional A&AS slots as required.
- 17.6. Assist ASC organizations in establishing and allocating manpower as required. Determine if organic resources are available before approving requests for use of A&AS (via the DDD). Validate the organization's proposed need for use of A&AS contracts that provide functional support.

- 17.7. Assist with review of contractor personnel qualifications (resume review) if/when requested by the requiring organization or contracting office.
- 17.8. (ASC/PK only) Provide expertise in review and disposition of A&AS contracting policy issues.
- 17.9. (ASC/PK only) For basic A&AS contracts, ensure COs review the requirement and sign the Determination and Findings (D&F) stating the required services are A&AS. Coordinate on the A&AS package for the basic contract.

18. Requiring Organization Responsibilities

- 18.1. Appoint a A&AS focal point with a minimum grade of lieutenant colonel or GS-14 and report the name, grade, office symbol, phone number, fax number, and e-mail address of the individual to ASC/CDS upon initial appointment and whenever a new person is assigned as the focal point.
- 18.2. Estimate and report A&AS requirements in dollars and CMEs for each fiscal year.
- 18.3. According to AFI 63-401, ensure funding documents read "THIS IS AN A&AS REQUIRE-MENT" and denote the proper A&AS code for certified funds used for A&AS.
- 18.4. (ASC/FM only) Ensure funding documents for A&AS are coded, track and monitor A&AS commitments, obligations, and expenditures as well as historical accounting data in the accounting system.
- 18.5. Manage A&AS CME and dollar ceilings within the organization's fiscal year resource allocations and ensure these ceilings are not exceeded.
- 18.6. According to the Federal Workforce Restructuring Act, certify that A&AS contracts will not be used to replace/offset organic authorizations eliminated as a result of the federal workforce draw down. This will be done for the initial contract and for each task/delivery order, or contract action, by completing a certification statement (ref. DDD).
- 18.7. Ensure the appointing of qualified personnel as FAE/QAE for each A&AS contract or task order and notify the CO and FAC of the name, office symbol, and phone number of the FAE upon initial appointment and whenever a new person is assigned as the FAE.
- 18.8. Ensure each FAE/QAE has sufficient background and training in the technical disciplines required to monitor the contract.
- 18.9. Ensure the FAE's/QAE's other duties do not conflict with those outlined in the FAE designation letter and surveillance plan.
- 18.10. Ensure the FAE/QAE develops a surveillance plan and maintains a surveillance log.
- 18.11. Each organization having A&AS contracts will have a designated person (for example, FAC, COR) appointed by the organization responsible for management of the contract and adherence to A&AS policies.
- 18.12. Ensure Government personnel within the organization are aware of inherently governmental functions and personal services.

19. Manpower Office (ASC/MQ) Responsibilities

- 19.1. Review basic contract RFP requirements to ensure the A&AS support to be contracted for was not previously performed by a government employee(s), who voluntarily or involuntarily, was separated from government employment due to the planned Federal workforce draw-down.
- 19.2. Ensure the proposed contracted effort will not be used to circumvent or undermine any organic manpower or personnel ceilings.
- 19.3. Review statements of work for the A&AS basic contract to ensure contractors are not required to perform inherently governmental functions and to determine applicability of OMB Circular A-76 cost comparison requirements.
- 19.4. Be responsible for the contracted man-year equivalents in the unit manning document.
- 19.5. Analyze historical organic authorizations in the requiring activity, research rationale for past reductions, and document findings and coordinate on support contracts as appropriate.
- 19.6. Process automated Authorization Change Requests (ACRs) to update the IDB.

20. ASC/PKW Responsibilities

- 20.1. ASC/PKWO administers service contracts (A&AS and non-A&AS) through base support contracts and GSA schedule contracts.
- 20.2. If ASC/PKWO is aware of A&AS that is embedded in the contract requirements, they will return the requirements package to the originator for the proper A&AS authorization and documentation, and notify the ASC customer of ceiling and reporting responsibility required by ASCI 63-401 and managed by ASC/CDS.
- 20.3. ASC/PKWRS administers IT contracts for all 88th CG customers at WPAFB.
- 20.4. ASC/PKWRE administers IT contracts for ASCAF organizations, NAIC, 74th Medical Center, and AFIT for requirements that fall outside of the 88th CG IT contracts.
- 20.5. ASC/PKWRS/PKWRE will work in concert with the 88th CG C4 Systems Officer (CSO) to review the IT requirements for A&AS content. If ASC/PKWRS/PKWRE is aware of A&AS that is embedded in the requirements package, they will return the requirements package to the originator for the proper A&AS authorization and documentation, and notify the ASC customer of ceiling and reporting responsibility required by ASCI 63-401 and managed by ASC/CDS.

21. 88th CG Responsibilities

- 21.1. Responsible for the review of all C4 requirements.
- 21.2. Provide expertise in review and disposition of C4 requirements to ensure compliance with A&AS guidance.
- 21.3. Include in its C4 requirements review and determination, whether the requirement consists of routine IT and exemption from A&AS. If the requirement contains A&AS that has not been approved (for example CMEs and dollars), 88th CG will return the requirements package to the originator for the proper A&AS authorization and documentation and notify the ASC customer of ceiling and reporting responsibility required by ASCI 63-401 and managed by ASC/CDS.
- 21.4. Ensure that all 88th CG personnel involved with CSRD review are trained to identify A&AS and routine IT requirements.

- 21.5. Establish periodic management reviews of services and A&AS support contract effort to verify that administrative procedures are working properly.
- 21.6. Ensure the appointment of qualified personnel as FAE/QAE for each contract or task order and notify the CO and FAC of the name, office symbol, and phone number of the FAE upon appointment and whenever a new person is assigned as the FAE.
- 21.7. If 88th CG is aware of A&AS that is embedded in the contract requirements, they will notify the ASC customer of ceiling and reporting responsibility required by ASCI 63-401 and managed by ASC/CDS.

22. FAC/COR Responsibilities

- 22.1. In conjunction with the FAE/QAE and CO, assist in the management of the contract/task order.
- 22.2. Ensure compliance with contract ceilings and period of performance.
- 22.3. Write contractor performance assessment reports or past performance reports (as defined in AFMCI 64-107, Contractor Performance Assessment Reporting System {CPARS}), as applicable.
- 22.4. Maintain accurate and up-to-date contract action (e.g., TO/DO) documentation with breakout in CME, associated costs, requiring organization, and period of performance. Ensure the CO is provided a copy of the documentation for inclusion in the official contract file.
- 22.5. Review, and coordinate on, FAE/QAE surveillance plan. Review reports periodically for acceptability.
- 22.6. Perform periodic reviews with the contractor.
- 22.7. Assist ASC/PK with A&AS contract related training requirements.
- 22.8. Review requests by non-ASC organizations to use an ASC functional support contract and provide recommendations to ASC/CDS and ASC/CD. The FAC/COR must consider contract ceiling impacts before recommending use of the contract. Approval of the requirement must first be obtained from the non-ASC organization's A&AS focal point, or equivalent, and the appropriate ASC contracting office, and submitted with the task/delivery order package.

23. FAE/QAE Responsibilities

- 23.1. Develop a surveillance plan for all appropriate parts of the task order.
- 23.2. Monitor the contractor's performance according to the surveillance plan, evaluate the contractor's performance, and enter the results into the surveillance log.
- 23.3. Promptly bring problems to the attention of the FAC/COR, the CO, and the contractor as necessary to ensure early resolution of issues.
- 23.4. Verify and validate the accuracy of the contractor's periodic invoice (that is, certificate of service, billing invoice, etc.).
- 23.5. Provide the FAC/COR a copy of evidence that the effort is complete (that is, DD Form 250, Material Inspection and Receiving Report, Final Invoice, etc.).

- 23.6. Maintain accurate and up-to-date contract action (that is, TO/DO) documentation with breakout in CME of functional type support, associated cost, requiring activity, and period of performance. Ensure the CO is provided a copy of the documentation for inclusion in the official contract file.
- 23.7. Provide timely and quality periodic surveillance reports to the FAC/COR.

24. Organizational A&AS Focal Point Responsibilities

- 24.1. The requiring organization A&AS focal point is the primary point of contact for all A&AS issues for the organization.
- 24.2. Responsible for the over-all two-letter ceiling management of A&AS.
- 24.3. Work with ASC/CDS to maintain, update, and review the two-letter organizational A&AS database on a continuous basis (monthly or as changes occur).
- 24.4. Review all task/delivery order requirements packages to be placed on contract for the two-letter organization and certify that adequate A&AS dollar and CME ceiling is available to support the proposed contract action.
- 24.5. Ensure timely reporting of A&AS contract obligations in the ASC/CDS database format for non-ASC/CDS (or non-311 HSW) managed A&AS contracts.
- 24.6. Coordinate on all organizational A&AS requirements for both current year and future years.
- 24.7. Work with organizational financial managers and ASC/CDS (or 311 HSW/CX) to complete the annual A&AS Presidential Budget exhibit (PB-15) report, which is submitted through ASC/CDS to HQ AFMC/FMB.

25. Federally Funded Research and Development Center (FFRDC) Support

- 25.1. DoD sponsored FFRDCs provide high-quality research, systems engineering and analytical work that is within the scope of their defined core work and draws on or sustains the strategic relationship between the FFRDC and it's sponsor.
- 25.2. The DoD currently sponsors eleven FFRDCs that fall under one of the three categories of FFRDCs defined by the National Science Foundation: (1) Studies and Analysis (S&A) Centers; (2) Systems Engineering and Integration (SE&I) Centers; and (3) Research and Development (R&D) Laboratories.
- 25.3. All FFRDC support acquired by ASC organizations must be reported through ASC/CDS to ASC/CD.
- 25.4. The FFRDC support reported to ASC/CDS and ASC/CD, in-turn, should indicate the type of support acquired, the period of performance, the total FFRDC contract cost, and the Staff-year of Technical Effort (STE). A STE staff-year (work-year) is defined as 1,810 hours of paid effort for technical services.

26. Relevant Internet World Wide Web Sites

- 26.1. The following Internet world wide web sites should be visited if you require additional information:
 - ASC/CDS (http://www.asc.wpafb.af.mil/base/asc/cds/title.htm)

- ASC/PK (http://www.asc.wpafb.af.mil/base/orgs/pk/pk/aandas.htm)
- HQ AFMC/PKPC (http://www.afmc.wpafb.af.mil/HQ-AFMC/PK/pkp/pkpc/advassis.htm)
- HQ AFMC/DR (http://afmc.wpafb.af.mil/HQ-AFMC/DR/dro/drom/)
- SAF/AQ (http://www.safaq.hq.af.mil/acq_ref/afae/)
- FAR (http://www.arnet.gov/far/97-05/html/37.html)

VINCENT J. RUSSO, Executive Director Aeronautical Systems Center

Attachment 1

GLOSSARY OF REFERENCES

References

Public Law 103-355, The National Defense Authorization Act for FY 1995 and The Federal Acquisition Streamlining Act of 1994.

Public Law 102-394, Section 512, Departments of Labor, Health, and Human Services and Education Appropriations Act. This was implemented by OMB Circular A-11.

Public Law 103-226, The Federal Workforce Restructure Act of 1994.

OMB Circular A-76, Performance of Commercial Activities.

OMB Circular A-11, Consulting Services.

OFPP Policy Letter 92-1, Inherently Government Functions.

OFPP Policy Letter 89-1, Conflicts of Interest Policies Applicable to Consultants.

5 U.S.C. 3109, Classification Act.

Federal Acquisition Regulation, supplements, and appendices (specific references are listed where applicable in the text portion of the instruction).

DoD Directive 5010.38, Internal Management Control Program.

DoD Directive 4205.2, Acquiring and Managing Contracted Advisory and Assistance Services.

AFI 63-401, Contracted Advisory and Assistance Services.

AFI 21-110, Engineering and Technical Services.

AFI 38-204, Programming USAF Manpower.

AFI 65-601, Volume 1, Budget Guidance and Procedures.

AFMCI 64-107, Contract Performance Assessment Reporting System (CPARS).

Attachment 2 GLOSSARY OF ABREVIATIONS AND ACRONYMS

Abbreviations and Acronyms

A&AS—Advisory and Assistance Services

ACR—Authorization Change Request

AFI—Air Force Instruction

AFETS—Air Force Engineering and Technical Services

AFMC—Air Force Materiel Command

AFMCI—Air Force Materiel Command Instruction

ASC—Aeronautical Systems Center

ASCAF—Aeronautical Systems Center Acquisition Force

CETS—Contract Engineering and Technical Services

CDRL—Contract Data Requirements List

CME—Contract Man-year Equivalent

CO—Contracting Officer

COR—Contracting Officer's Representative

D&F—Determination & Finding

DDD—Determination/Decision Document

DO—Delivery Order

DoD—Department of Defense

DoDD—Department of Defense Directive

DoJ—Department of Justice

DSO—Development System Office

FAC—Functional Area Chief

FAE—Functional Area Evaluator

FAR—Federal Acquisition Regulation

FFRDC—Federally Funded Research and Development Contract

FMS—Foreign Military Sales

FPDS—Federal Procurement Data System

FY—Fiscal Year

ICAPEA—Initial Contract Award Proposal

IDB—Integrated Data Base

IT—Information Technology

MIS—Management of Information Systems

OFPP—Office of Federal Procurement Policy

OMB—Office of Management and Budget

O&M—Operations and Maintenance

PB-15—Exhibit President's Budget Exhibit (PB-15) Annual A&AS Report

PSG—Product Support Group

PSO—Product Support Office

QAE—Quality Assurance Evaluator

R&D—Research and Development

SAR—Special Access Requirement Program

SETA—Systems Engineering and Technical Assistance

SPO—System Program Office

STE—Staff-year of Technical Effort

TO—Task Order

Attachment 3 GLOSSARY OF TERMS

Terms

Advisory and Assistance Services (A&AS)—Services that are acquired by contract from non-governmental sources to support or improve organization policy development, decision-making, management, and administration; support program and/or project management and administration; provide management and support services for R&D activities; provide engineering and technical support services; or to improve the effectiveness of management processes or procedures. Such services may take the form of information, advice, opinions, alternatives, analyses, evaluations, recommendations, training, and technical support. Examples of A&AS support are provided in paragraph 2.3 of the text.

A&AS Focal Point—Focal point in a SPO or 2-letter ASC organization with a rank of lieutenant colonel or GS-14, who is the key focal point for that organization for all A&AS activities. This person is responsible for overall management of the 2-letter A&AS dollar and CME ceiling.

A&AS Management Plan—A living document that identifies projected and ongoing A&AS requirements for current FY, budget year, and estimates for 5 additional years. For each ongoing and projected requirement, the plan must describe the requirement, justify it, show its estimated cost, and explain why contractual services are needed to satisfy the requirement. The plan must also address A&AS ceilings, trade-offs made for unforeseen requirements, requirements which must be deferred, and minutes of any meetings of any local boards or councils which oversee the A&AS process. This plan also addresses A&AS that is budgeted and executed at ASC as well as A&AS that is budgeted by non-ASC organizations but is executed by ASC organizations.

A&AS Reporting Categories—See para 3.4 for reporting categories.

Acquisition Organization—Any organization that directly performs, manages, or supports weapon system acquisition activities at ASC. This includes programs offices (SPOs, PSOs, DSOs), functional home offices, and acquisition support offices at Wright-Patterson AFB and Brooks AFB.

Aeronautical System Center Acquisition Force (ASCAF)—An integrated AFMC organization responsible for cradle-to-grave military systems management. This organization is headed by a Program Director who has overall responsibility and accountability for program execution. A ASCAF organization may be in the form of a Systems Program Office (SPO), Development Support Office (DSO), or Product Support Group (PSG), Functional Directorates, and Staff Support Offices.

Annual A&AS—**Budget Exhibit (PB-15)** The source document for which total A&AS obligations and estimates are derived and reported by the DoD to the OMB and Congress. The PB-15 reports dollars by FY, appropriation, program element, etc., for prior year, current year, and budget year.

Authorization Change Request—A form filled out and sent to ASC/MO for processing to change data elements in the unit authorization file or the manpower data file.

Base Operating Support—Purchase of relatively standard "off-the-shelf" supplies and services.

Blue Contracting—When funding is provided to a prime contractor who, in-turn, procures A&AS on behalf of an Air Force organization. Although these resources are performing A&AS work, because they are purchased through a prime contractor, they loose identity as A&AS resources. As a result, the A&AS

activity does not get reported in the annual President's Budget Exhibit #15 (PB-15) report, the A&AS Management Plan, nor tracked under the center's A&AS ceiling.

Budget Authority—Congressional authorization to procure goods and services within a specified amount by appropriation/program.

Commercial Activities—A product or service which is obtainable (or is obtained) from a commercial source (i.e., a commercial market exists). Commonly thought of as "base services," commercial activities also includes audiovisual, communications-computer systems, equipment and instrument fabrication, weapon system or component maintenance, repair or testing, administrative or office support, training, and laboratory testing (Source: AFMC FAR Sup 5337.9202).

Commitment—The formal administrative reservation of funds.

Contract Engineering and Technical Services (CETS)—CETS is on-site support provided by technically-qualified defense contractor representatives to elevate the skills and abilities of AFETS Air Force military and civilian personnel to the self-sufficiency level. They provide Air Force units with full engineering support and instruction, technical advice, and training in the installation, operation, and maintenance of aircraft and aerospace equipment, weapon systems, and ground-based communications, radar, and computer equipment. Air Force or contractor CETS specialists provide these services using hands-on training or other forms of instruction. May also refer to the people who perform these duties. More information on CETS may be obtained in AFI 21-110, "Engineering and Technical Services" (31 Aug 94).

Contractor Logistics Support (CLS)—CLS is a planned, permanent contractor support method to provide all or part of the ILS elements for a system, equipment, or item when fielded. CLS services can be used to support item management, configuration and data management, supply, distribution, repair, depot maintenance, operating command organizational maintenance (and other levels as negotiated), and many other operations and maintenance tasks normally performed by an organic support activity. CLS applications include the support of government-owned commercial off-the-shelf aircraft, missiles, and equipment; research and development prototypes converted to operational use; contract depot-purchased equipment maintenance (the contracting out of depot-repairable items by an Air Force depot); and other instances where AFMC organic life-cycle logistics support is not planned for various reasons. CLS are services budgeted and funded under EEIC 592 and reported under OMB Circular A-11, Object Class 25.7, Operations and Maintenance of Equipment. More information on CLS may be obtained in AFR 800-21, "Contractor Support for Systems and Equipment" (20 Mar 87), and AFI 63-111 (DRAFT), "Contractor Support for Systems and Equipment" (Jun 97).

Contracting Office—An office that awards or executes a contract for supplies or services and performs post award functions not assigned to a contract administration office.

Contracting Officer (CO)—The duly appointed Government agent authorized to award or administer contracts. The CO is the only person authorized to contractually obligate the Government.

Contracting Officer's Representative (COR)—An individual designated and authorized in writing by the CO to perform specific technical or administrative functions.

Contract Man-year Equivalent—(CME) A representation (measurement) of contractor effort to produce services. An A&AS CME is obtained by dividing the total number of contract labor hours by 1764. In other words, one CME is equal to 1764 hours (also reference paragraph 6.5).

Delivery Order (DO)—The formal contractual direction for a contractor to deliver specific quantities of

supplies under delivery order contracts. Note: A&AS acquired on delivery order contracts, using delivery orders, must be identified, controlled and managed as if they were being issued using TO procedures. (Also see Task Order definition.)

Delivery Order Contract—A contract for supplies that does not procure or specify a firm quantity of supplies (other than a minimum or maximum quantity) and that provides for the issuance of orders for the delivery of supplies during the period of the contract.

Determination and Findings (D&F)—A special form of written approval by an authorized official that is required by statute or regulation as a prerequisite to taking certain contracting actions. The "determination" is a conclusion or decision supported by the "findings." The findings are a statement of fact or rationale essential to support the determination and must cover each requirement of the statute or regulation.

Expenditure—Payments made against a particular contract which liquidate an obligation.

Financial Manager—The individual in the organization who manages the program funds cited on the contractual administrative commitment document.

Functional Area Chief (FAC)—The Government representative responsible for a functional area in which the services are provided by a contractor. Depending on the activity and type of service required, the FAC is usually the program manager, laboratory director, test facility manager, or equivalent. This position may also be referred to as a COR in some contracting environments.

Functional Area Evaluator (FAE)—The Government representative responsible for monitoring, evaluating, and reporting contractor's performance on a specific contract requirement (for example, task, subtask, or any grouping of these). This person may also be called a technical representative of the CO, or a QAE, and may be responsible for more than one functional area.

Functional Organization—Basic management structure of Air Force organizations such as ASC, which provides for subject matter expertise and conserves resources, especially manpower. Manpower is divided into organizations by their function (i.e., contracting, engineering, logistics, program management, etc.)

Functional Support—In this instruction, the term refers to support for acquisition logistics, acquisition security, acquisition management, test and evaluation management, management operations, engineering, manufacturing, Government furnished property management, configuration and data management, acquisition environmental management, financial management, specialized pricing/should cost, and safety.

Inherently Governmental Functions—Functions that warrant performance by Government employees because they are so intimately related to the public interest. These functions apply to activities that require (1) the use of discretion in applying Government authority, or (2) the use of value judgments in making decisions for the Government. (Source: OFPP Policy Letter 92-1)

Information Technology (IT)—Any equipment, or interconnected system(s) or system(s) of equipment, that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the agency.

- (a) For purposes of this definition, equipment is used by an agency if the equipment is used by the agency directly or is used by a contractor under a contract with the agency which:
 - (1) Requires the use of such equipment; or

- (2) Requires the use, to a significant extent, of such equipment in the performance of a service or the furnishing of a product.
- (b) The term "Information Technology" includes computers, ancillary equipment, software, firmware and similar procedures serviced (including support services), and related sources.
 - (c) The term "Information Technology" does not include:
 - (1) Any equipment that is acquired by a contractor incidental to a contract; or
- (2) Any equipment that contains imbedded IT that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information, (for example, heating, ventilation, and air conditioning equipment such as thermostats or temperature control devices, and medical equipment where IT is integral to its operation.

Initial Contract Award—Any new contract resulting from source selection or other negotiated acquisitions. It excludes within scope modifications, definitizations, and exercise of options under existing contracts as well as one and two step sealed bid and downselection portions of rolling downselection processes. FAR subparts 37.203 and 37.204 place special emphasis and requirements on querying the Federal Government for available personnel prior to using A&AS contractors for ICAPEA support.

Initial Contract Award Proposal Evaluation and Analysis (ICAPEA—) Involves the use of A&AS support for source selection or other negotiated acquisitions, (applies to competitive and Sole Source negotiations.) Reference previous definition (initial Contract Award) for additional information.

Integrated Data Base (IDB)—A database, managed by ASC/HR, used to track ASC personnel.

Interim Contractor Support (ICS)—ICS is a planned, temporary contractor support method to provide all or part of the ILS elements for a system, equipment, or item during the time period from first production article delivery until an organic support or a competitive CLS capability is achieved. There are generally only two reasons that justify the use of ICS. (1) The items to be supported, or items of support equipment have an unstable design, such that the projected cost of setting up organic capability at the time operational support is required is excessive, either because of the uncertainties in the type and level of support required or because of the risk that support resources will become obsolete, if procured too early. (2) The items to be supported, or items of support equipment, are design stable, but all or part of the resources required to establish an organic capability will not be available until after operational support is first required. ICS is services budgeted and funded under EEIC 585 and reported under OMB Circular A-11, Object Class 25.7, *Operation and Maintenance of Equipment*. More information on CLS may be obtained in AFR 800-21, "Contractor Support for Systems and Equipment" (20 Mar 87), and AFI 63-111 (DRAFT), "Contractor Support for Systems and Equipment" (Jun 97).

New Work—Any effort that constitutes additional work above an organization's directed mission and workload baseline, as defined by approved Program Management Directives, Memoranda of Agreement, Memoranda of Understanding, or Inter-service Support Agreements. Non-directed work such as Center initiatives may also be considered new work if it constitutes additional workload and is in support of the overall ASC mission.

Non-Routine IT—The computer support may be considered A&AS if the effort supports the day-to-day operations/mission of the program office, performing and supporting activities such as inputting/maintaining spreadsheets, status reports and published schedules. Some examples of these activities

include configuration management status accounting reports, deficiency reports, milestone schedules, engineering change proposal tracking, or other program related documentation/activities.

Obligation—A monetary liability of the Government limited in amount to legal liability of the Government at the time of recording. Must be supported by documentary evidence of the transaction involved (i.e., a Government liability resulting from a firm contractual document).

Operations and Maintenance (O&M)—The operation and maintenance of a test facility, a communication-computer systems facility, an installation, a range, or a laboratory.

Organic Manpower—United States Government military and civilian manpower positions.

Quality Assurance Evaluator (QAE)—A functionally qualified person who performs quality assurance functions for a contracted service.

Personal Services Contract—A contract that, by its express terms or as administered, makes the contractor personnel appear to be Government employees. See the FAR for special approval requirements.

Program Element (PE)—A major weapon system/program identification number in the fund cite.

Program Manager—The person ultimately responsible for the management of a program.

Requiring Organization—Government agency/office that has a requirement for A&AS.

Routine Automated Data Processing and Telecommunication Services—For purposes of this instruction, means Federal Information Processing Resources as defined in FAR Appendix A, "Acquisition of Federal Information Processing Resources by Contracting." Subpart 201-39.201, unless they are an integral part of a A&AS contract. Federal Information Processing Resources means automatic data processing equipment as defined in Public Law 99-500 (40 U.S.C. 759(a)(2)). This is any equipment or interconnected system or subsystems of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception, of data or information by a Federal agency or under a contract with a Federal agency which requires the use of such equipment, or requires the performance of a service or the furnishing of a product which is performed or produced making significant use of such equipment. A common example of routine automated data processing and telecommunication services is support for a local area network to include all computers, ancillary equipment, and software or firmware.

Service Contract—A contract that directly engages the time and effort of a contractor whose primary purpose is to perform an identifiable task (for example, prepare a report, perform a study, or provide services) rather than to furnish an end item of supply. A service contract may be either a non-personal services or personal services contract. It can also cover services performed by either professional or nonprofessional personnel whether on an individual or organizational basis, (see FAR 37.101).

Suballotment Document—A document that further directs an organization's budget authority to another organization to be loaded in the other organization's accounting system/paying station.

Supply Contract—A contract to purchase a tangible end item. The item has an intrinsic value, and its delivery to the Government is both the object of the contract and the basis for the payment. It should be noted that a supply contract may contain A&AS requirements.

Sustaining Engineering—Sustaining Engineering is a subset of Maintenance Engineering. Sustaining Engineering accounts for contractual costs of engineering efforts on systems, products, or materials

required to resolve technical or supportability deficiencies revealed in operational service. Sustaining Engineering includes, but is not limited to, assessing deficiency indicators; defining the characteristics and cause of such deficiencies; determining the impact on the affected product; identifying and evaluating alternative solutions; determining the preferred solution; and designing, integrating, and validating the solution. This includes all associated contractual efforts (for example, engineering and technical data, modeling, simulation, and testing) that are integral to the completion of the overall engineering task. Sustaining Engineering are services budgeted and funded under EEIC 583 and reported under OMB Circular A-11, Object Class 25.7, *Operation and Maintenance of Equipment*. More information may be obtained in the AFMC Financial Management Handbook, chapter 96, "Sustaining Engineering Process" (20 Feb 97).

System Program Office (SPO)—The SPO is removed from the basic functional structure and the System Program Director is provided a discreet line of authority so that broad and multiple requirements of systems acquisitions can be met.

Task Order (TO)—The formal contractual direction for a contractor to accomplish specific tasks under TO contracts.

Task Order Contract—A contract for services that does not procure or specify a firm quantity of services (other than a minimum or maximum quantity) and that provides for the issuance of orders for the performance of tasks during the period of the contract.

Technical Direction—The advisory process by which the CO's designated representative provides clarification to a contractor for performance under a TO. Technical direction may be oral or in writing, but cannot, in itself, be contractually binding nor may it change the terms or conditions of a TO.